

1 MERKLE SIEGEL & FRIEDRICHSEN, P.C.  
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THE HON. JOHN C. COUGHENOUR

9 UNITED STATES DISTRICT COURT  
10 WESTERN DISTRICT OF WASHINGTON, SEATTLE

11 JAMES S. GORDON, Jr., a married  
individual, d/b/a  
12 'GORDONWORKS.COM',

13 Plaintiff,

14 v.

15 VIRTUMUNDO, INC, a Delaware  
corporation, d/b/a  
16 ADNOWLEDGEMAIL.COM;  
ADKNOWLEDGE, INC., a Delaware  
corporation, d/b/a  
17 ADKNOWLEDGEMAIL.COM;  
SCOTT LYNN, an individual; and  
18 JOHN DOES, I-X,

19 Defendants.  
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NO. CV06-0204JCC

DECLARATION OF  
Anthony Potts

IN SUPPORT OF PLAINTIFF'S  
MOTION FOR PARTIAL  
SUMMARY JUDGMENT

22 Anthony Potts, declares as follows:

23 1. I, Anthony Potts am over the age of 18, of sound mind, and am otherwise competent to  
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25 DECLARATION OF  
IN SUPPORT OF PLAINTIFF'S MOTION FOR PARTIAL  
SUMMARY JUDGMENT  
DISMISS GORDON v. VIRTUMUNDO GROUP, INC.

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tesury.

2. I am and have been since February 28, 1995, a Washington State resident.

3. Since July 19, 2005 I have been the registrant of the internet domain '[anthonycentral.com](http://anthonycentral.com)'.

4. All email addresses at the '[anthonycentral.com](http://anthonycentral.com)' domain are held by Washington State residents. During the time the emails in question from Defendants were received.

[amra@anthonycentral.com](mailto:amra@anthonycentral.com)

[ant@anthonycentral.com](mailto:ant@anthonycentral.com)

[chuck@anthonycentral.com](mailto:chuck@anthonycentral.com)

[dewayne@anthonycentral.com](mailto:dewayne@anthonycentral.com)

[jessica@anthonycentral.com](mailto:jessica@anthonycentral.com)

[nora@anthonycentral.com](mailto:nora@anthonycentral.com)

[sandy@anthonycentral.com](mailto:sandy@anthonycentral.com)

[tachler@anthonycentral.com](mailto:tachler@anthonycentral.com)

[tj@anthonycentral.com](mailto:tj@anthonycentral.com) ]

5. At all times since I registered the '[anthonycentral.com](http://anthonycentral.com)' domain the information of my Washington residency, and other email users at "[anthonycentral.com](http://anthonycentral.com)" has been available through my domain registrar, and directly from me to anyone who would inquire.

6. My domain is hosted by Omni Innovations, LLC. on its server.

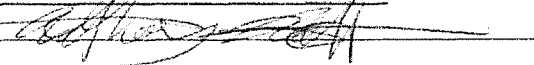
7. I have received multiple commercial emails sent to email addresses at my domain from defendants in this lawsuit.

I swear under the penalty of perjury under the laws of the State of Washington, that the foregoing is true and correct.

EXECUTED this 17th day of December, 2006

DECLARATION OF  
IN SUPPORT OF PLAINTIFF'S MOTION FOR PARTIAL  
SUMMARY JUDGMENT  
DISMISS GORDON v. VIRTUMUNDO GROUP, INC.

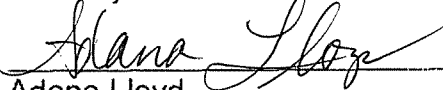
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1 Anthony Potts 

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4 Certificate of Service

5 I, hereby, certify that on December 19, 2006, I filed this affidavit with this Court via  
6 approved electronic filing, and served the following:

7 Attorneys for Defendants: Derek Newman

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9 Adana Lloyd

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